UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

INDICTMENT FOR CONSPIRACY, BANK ROBBERY, AND USE OF A FIREARM IN THE COMMISSION OF A BANK ROBBERY

UNITED STATES OF AMERICA * CRIMINAL DOCKET NO.:

v. * SECTION:

COREY RICHARDSON * VIOLATION: 18 U.S.C. § 371

ERROL HARRIS

VINCENT BEVERLY

*

18 U.S.C. § 2113(a)

18 U.S.C. § 2113(d)

18 U.S.C. § 22113(d)

18 U.S.C. § 2210(d)

* * * * *

The Grand Jury charges that:

COUNT 1

A. THE CONSPIRACY:

Beginning at a time unknown and continuing thereafter until on or about May 4, 2010, in the Eastern District of Louisiana, the defendants, **COREY RICHARDSON**, **ERROL HARRIS**, **VINCENT BEVERLY**, and **DORIYAH JORDAN**, did knowingly and willfully combine, conspire, confederate and agree with each other and with other persons both known and unknown to the Grand Jury to take by force, violence, and intimidation from the person and presence of another, United States currency, belonging to and in the care, custody, control, management and

possession of Capital One Bank, Edgard, Louisiana, the deposits of which were then insured by the Federal Deposit Insurance Corporation (FDIC), and in committing such offense, the defendants, **COREY RICHARDSON, ERROL HARRIS, VINCENT BEVERLY,** and **DORIYAH JORDAN**, did assault and put in jeopardy the life of another person by the use of a dangerous weapon, to wit, a firearm; in violation of Title 18, United States Code, Sections 2113(a) and 2113(d).

B. OVERT ACTS:

In furtherance of the unlawful conspiracy and to accomplish the objectives thereof, the conspirators committed the following overt acts, among others, in the Eastern District of Louisiana:

- On or about May 4, 2010, the defendants, COREY RICHARDSON, ERROL HARRIS,
 DORIYAH JORDAN and VINCENT BEVERLY drove from New Orleans, Louisiana to Edgard,
 Louisiana.
- 2. On or about May 4, 2010, in an effort to survey the bank before the robbery, the defendant, **DORIYAH JORDAN**, entered the Capital One Bank located at 2447 Highway 18, Edgard, Louisiana, and inquired about opening an account.
- 3. On or about May 4, 2010, the defendants, **COREY RICHARDSON**, **ERROL HARRIS** and **DORIYAH JORDAN**, drove to the Capital One Bank.
- 4. On or about May 4, 2010, the defendant, **VINCENT BEVERLY**, remained in the vicinity of the Capital One Bank in a separate car.
- On or about May 4, 2010, the defendants, COREY RICHARDSON and ERROL
 HARRIS, placed masks over their faces.
- 6. On or about May 4, 2010, the defendants, **COREY RICHARDSON** and **ERROL HARRIS**, entered the Capital One Bank with a handgun.

- 7. On or about May 4, 2010, the defendant, **ERROL HARRIS**, pointed a handgun at a Capital One Bank employee, while the defendant, **COREY RICHARDSON**, jumped over the bank teller counter and removed money from the bank teller drawers.
- 8. On or about May 4, 2010, the defendants, **COREY RICHARDSON**, **ERROL HARRIS** and **DORIYAH JORDAN** contacted **VINCENT BEVERLY** by cellular telephone after fleeing from the bank.
- 9. On or about May 4, 2010, the defendant, **VINCENT BEVERLY**, attempted to assist the defendants, **COREY RICHARDSON**, **ERROL HARRIS** and **DORIYAH JORDAN**, in their attempt to flee from Edgard, Louisiana.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

On or about May 4, 2010, in the Eastern District of Louisiana, the defendants, **COREY RICHARDSON** and **ERROL HARRIS**, by force, violence, and intimidation did take and attempt to take from the person and presence of another, approximately twenty thousand (\$20,000) dollars in United States currency belonging to, and in the care, custody, control, management, and possession of Capital One Bank, 2447 Highway 18, Edgard, Louisiana, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, the defendants, **COREY RICHARDSON** and **ERROL HARRIS**, did assault and put in jeopardy the life of another person by the use of a dangerous weapon, to wit, a firearm; all in violation of Title 18, United States Code, Sections 2113(a), 2113(d), and 2.

COUNT THREE

On or about May 4, 2010, in the Eastern District of Louisiana, the defendants, **COREY RICHARDSON** and **ERROL HARRIS**, did knowingly use and carry a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, to wit: bank robbery as charged in Count 2 of this Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

NOTICE OF FORFEITURE

- 1. The allegations of Counts One through Three of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 924(d)(1), Title 28, United States Code, Section 2461(c).
- 2. As a result of the offenses alleged in Counts One through Three, defendants, **COREY RICHARDSON**, **VINCENT BEVERLY**, **DORIYAH JORDAN** and **ERROL HARRIS**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), Title 28 United States Code, Section 2461(c) any firearm or ammunition, which was involved in or used in knowing violations of Title 18, United States Code, Sections 2113 and 924(c), as alleged in Counts One through Three of this Indictment.
- 3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendant:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 2113 and 924(d)(1) and Title 21, United States Code, Section 853.

	A TRUE BILL:	
	FOREPERSON	
JIM LETTEN United States Attorney Bar Roll No. 8517		

JAN MASELLI MANN
First Assistant United States Attorney
Chief, Criminal Division
Bar Roll No. 9020

ELIZABETH PRIVITERA
Assistant United States Attorney

Bar Roll No. 27042

New Orleans, Louisiana June 24, 2010